

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

HRISOULA STANTZOS  
DEBTOR

MEMBERS 1ST FEDERAL CREDIT UNION  
MOVANT

V.

HRISOULA STANTZOS  
RESPONDENT

CHARLES J. DEHART, III  
TRUSTEE/RESPONDENT

CHAPTER 13

1:19-BK-01432-HWV

ANSWER

**ANSWER**

**AND NOW**, this 17th day of February, 2020, the Debtor, Hrisoula Stantzios, by and through her counsel, Dawn M. Cutaia, files this Answer to the Motion for Relief from Stay filed by Members 1st Federal Credit Union:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part. By way of clarification, Debtor is female and she is elderly and English is not her first language. Her son George Stantzios is her attorney in fact.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted in part; denied in part. George Statnzos was hospitalized twice since Debtor's bankruptcy was filed but his health issues have subsided and he is able to move forward with seeking a loan modification on this property.
13. Denied. George Stantzios was unable to move forward with the loan modifications due to his hospitalizations.
14. George Stantzios has been attempting to locate a commercial appraiser who

is able to appraise the property.

15. Admitted.
16. Denied. There two businesses on the property - a hair salon and a pizza shop - both very recently passed their fire inspections; a residential apartment on the property is being renovated.
17. Denied.
18. Denied.
19. Denied.
20. Denied.
21. Admitted.
22. Admitted.

**WHEREFORE**, the Debtor respectfully requests this Honorable Court deny the Motion for Relief.

Date: 2/17/2020

Respectfully Submitted,  
By: **/s/ Dawn M. Cutaia**  
Supreme Court ID 77965  
Attorney for Debtor(s)  
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